

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CENTRAL STATES, SOUTHEAST AND)
SOUTHWEST AREAS PENSION FUND,)
and HOWARD McDougall, trustee,)
)
)
v.) Case No. 08 C 482
)
)
Plaintiffs,) Honorable
) District Judge Kennelly
BLOM TRUCKING, INC.,)
an Ohio corporation,)
)
Defendant.)

AFFIDAVIT OF REBECCA K. MCMAHON

State of Illinois)
)
) SS
County of Cook)

I, Rebecca K. McMahon, having been duly sworn on oath, depose and state as follows:

1. I am an attorney employed by the Central States, Southeast and Southwest Areas Pension Fund ("Pension Fund") and I am familiar with the pending litigation.
2. I graduated from Valparaiso University School of Law in 2006. I was admitted to the bar of the State of Illinois on November 9, 2006 and admitted to practice in the United States District Court for the Northern District of Illinois on January 11, 2007. I have worked as an attorney responsible for ERISA contribution and withdrawal liability litigation since 2006.
3. I have reviewed the Pension Fund's billing records and have determined that

I have rendered actual, necessary legal services in connection with the prosecution of this action. I believe that a reasonable rate for the aforementioned services is \$135.00 per hour for work performed by myself.

4. In addition to the work performed by the above attorneys, paralegal services were performed by George O. Hansen. George O. Hansen is a litigation paralegal employed by the Pension Fund. I believe that a reasonable rate for the paralegal services of George O. Hansen is \$105.00 per hour.

5. On this basis, the total of legal fees incurred in this matter is \$795.00 (4.8 hours x \$135.00 per hour for myself, 1.4 hours x \$105.00 per hour for George O. Hansen).

6. The legal services are briefly summarized as follows: review file, including collective bargaining agreement, participation agreement, and current claim; preparation of complaint, appearance, and summons; review affidavits of service; court appearance; preparation of motions for entry of judgment by default, including supporting affidavits, exhibits, and proposed judgment order.

7. Based upon my experience in similar cases, I believe that the above rates are at or below the market rate charged for legal work and therefore, are reasonable. I also believe that the amount of time spent by me, and George O. Hansen on this case is reasonable. On that basis, the total of legal fees incurred in this matter is \$795.00.

8. The Pension Fund has also incurred the following costs in connection with this litigation in the total amount of \$500.00, consisting of Filing Fee in the amount of \$350.00 and Service of Process fees in the amount of \$150.00.

9. I believe that the aforementioned legal fees and costs were necessarily incurred and are reasonable in amount.

FURTHER AFFIANT SAYETH NOT.

Rebecca K. McMahon
Rebecca K. McMahon

Subscribed and sworn to before
me, a Notary Public, this 21st
day of March, 2008.

Rebecca K. McMahon
Notary Public

